



100 GARDEN CITY PLAZA, SUITE 500  
GARDEN CITY, NEW YORK 11530  
T: 516-203-7600  
F: 516-282-7878

February 17, 2022

**VIA ECF**

Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Rm 618  
New York, NY 10007

**MEMO ENDORSED**

Re: Flash90 Ltd. v. Sahara Reporters Media Group Inc., 1:21-cv-08969 (KPF)

Dear Judge Failla:

We represent plaintiff Flash 90 Ltd. (“Plaintiff”) in the above-captioned case and write pursuant to Section 2.E. of Your Honor’s Individual Practices to respectfully request a 30-day extension of time to file a Notice of Dismissal (or otherwise move to re-open the case).

- (1) the current deadline for the parties to file a Notice of Dismissal is February 21, 2022 [Dkt. No. 11];
- (2) there was no previous requests for an extension;
- (3) no previous requests were granted or denied;
- (4) the parties respectfully request an additional 30-day extension in order to consummate their settlement.
- (5) Counsel for Defendant Sahara Reporters Media Group Inc. consents to the requested relief.

Respectfully Submitted,

**s/jameshfreeman/**  
James H. Freeman

*Counsel for Plaintiff*

Application GRANTED. The deadline for the parties to file a Notice of Dismissal or otherwise move to re-open the case is hereby extended to March 23, 2022. The Clerk of Court is directed to terminate the pending motion at docket number 13.

Dated: February 18, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE